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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

August 28, 2003

Marlene H Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: *Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon*  
*Addendum to the Petition for Temporary Waiver of*  
*Section 20.18(c) and Extension of Time*  
*CC Docket No. 94-102*  
*ATTN: Wireless Telecommunications Bureau*

Dear Ms. Dortch:

Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon ("Ramcell"), by its attorneys, hereby submits this letter supplementing its current waiver petition on file which requests additional time to become capable of transmitting calls for 911 emergency calling from text telephone ("TTY") devices.<sup>1</sup> Ramcell is the licensee of Station KNKN393 in the Block B portion of the Oregon 5 - Coos RSA. Ramcell hereby requests until November 24, 2003 to meet its obligations set forth in Section 20.18(c) of the Commission's rules regarding the ability of digital wireless systems to become capable of transmitting calls from TTY devices.

On June 28, 2002 Ramcell submitted a timely request with the Commission for a limited waiver of Section 20.18(c) of the Commission's rules to meet the June 30, 2002 deadline for digital wireless systems to be TTY compliant. In its Petition, Ramcell originally estimated that it needed until December 31, 2002 in order to receive from its vendors and install the needed modifications to its network. By December 31, 2002, however, Ramcell was still unable to receive the equipment from its vendors due to lack of funding, accordingly Ramcell filed a supplemental extension requesting until August 31, 2003 to become capable of transmitting calls for 911 emergency calling from TTY devices.

<sup>1</sup> *Litchfield County Cellular, Inc. d/b/a Ramcell of Oregon, Petition for Temporary Waiver of Section 20.18(c) and Extension of Time* CC Docket 94-102 (June 28, 2002) ("Petition")

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The primary reason for Ramcell's inability to meet its TTY obligation, is its inability to acquire the necessary funding to pay for the significant costs associated with upgrading its hardware and software. Despite the lack-luster economy, Ramcell remained optimistic that it would locate the necessary funding. Ramcell contacted numerous financial institutions in its attempts to secure adequate financing. Ramcell is pleased to report that just within the last few weeks, it was able to obtain the funding needed to purchase the equipment and upgrades needed to become capable transmitting 911 calls from TTY devices.

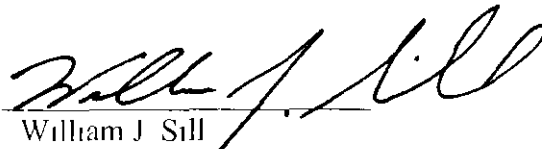
With funding secured, on August 12, 2003, purchase orders were issued to acquire the needed equipment and upgrades. The upgrades planned by Ramcell will bring Ramcell in compliance with various regulatory obligations for which it currently has outstanding waiver requests.<sup>2</sup> It is currently anticipated that the hardware will arrive by September 26, 2003, although Ramcell is attempting to accelerate this date. Once the hardware is received, Lucent technicians will install the hardware and software changes to Ramcell's system. It is anticipated that Lucent will finish installing the hardware and software by October 31, 2003. Given the significant upgrades planned by Ramcell, it estimates that it will need until mid-November to receive, implement, and test its upgrades to ensure that its system is properly operating. Thus, Ramcell is requesting until November 24, 2003 to become capable of transmitting calls from TTY devices. Ramcell will provide the Commission with a Report of its progress in receiving and implementing its hardware and software upgrades on October 17, 2003.

If you should have any questions regarding this matter, please contact the undersigned counsel at (202) 783-4141.

Sincerely,

WILKINSON BARKER KNAUER, LLP

By

  
William J. Sill  
Georgina L. O. Feigen

Cc: Mindy Littell, Wireless Telecommunications Bureau, Policy Division  
Andra Cunningham, Wireless Telecommunications Bureau, Policy Division

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<sup>2</sup> In CC Docket No. 99-200, Ramcell has requested a waiver of the requirement that it be capable supporting the nationwide roaming of ported and pooled numbers. The funding recently obtained by Ramcell will enable it to acquire all the equipment and upgrades needed to bring it in compliance with its TTY obligations as well as its obligation to support the nationwide roaming of ported and pooled numbers.